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NSB NEW LONDON
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LETTER AND NO FURTHER COMMENTS FROM NATIONAL OCEANIC AND ATMOSPHERIC
ADMINISTRATION REGARDING DRAFT FINAL PRE-DESIGN SAMPLING AND ANALYSIS
PLAN OPERABLE UNIT 4 (OU4) SEDIMENT NSB NEW LONDON CT
2/27/2012
NATION OCEANIC AND ATMOSPHERIC ADMINISTRATION

Rich, Corey

From: Ken Finkelstein <ken.finkelstein@noaa.gov>
Sent: Monday, February 27, 2012 4:29 PM
To: Rich, Corey
Cc: Kymberlee Keckler; Kenneth_Munney@fws.gov; Oconnor, Dominic CIV NAVFAC MIDLANT, NE IPT; McKenzie, Tracey P CIV NAVFAC MIDLANT, PWD New London; Ganser, Leanne; Lewis, Mark
Subject: Re: Responses to Comments - Draft Final OU4 Sediment PDI SAP

Hi Corey:

No I have nothing to add. My comments were very brief. As far as I can tell, I owe you comments on the Proposed Plan (Lower Subbase Proposed Remedial Action Plan) and you owe me a "Final" ROD" that includes my (again brief comments) for OU-4. Can you confirm? Thanks.

On Mon, Feb 27, 2012 at 3:36 PM, Rich, Corey <Corey.Rich@tetrattech.com> wrote:

Ken Finkelstein and Ken Munney,

Do either of you have further comment on the response-to-comment documents sent on February 3, 2012 or the draft final Lower Subbase OU4 Sediment PDI SAP sent December 27, 2011? We are trying to finalize the SAP and would like to conduct the sampling in March/April 2012 timeframe, but would like your concurrence before starting. If possible, please provide your input before the end of this week.

Thanks,

Corey Rich, P.E. | Water Management Technical Lead/Senior Project Manager

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**RESPONSES TO SEPTEMBER 26, 2011 NOAA COMMENTS ON THE
DRAFT SAMPLING AND ANALYSIS PLAN FOR PRE-DESIGN INVESTIGATION FOR ZONE 4
SEDIMENT AND DECEMBER 30, 2012 COMMENTS ON THE DRAFT FINAL SAMPLING
AND ANALYSIS PLAN
NAVAL SUBMARINE BASE – NEW LONDON, GROTON, CONNECTICUT**

**Initial Issue: October 19, 2011; Revision 1 Issue: October 27, 2011;
Revision 2 Issue: February 2, 2012**

SEPTEMBER 26, 2011 COMMENTS:

SPECIFIC COMMENTS

Comment 1:

The legend on Figure 4-6 is not clear. Because you use the word "or", Green and Red triangles say the same thing. For example, Station Z4-33 (values provided in upper right of Figure 4-6) should be a green triangle because Total PCB Concentrations are less than 1.0 mg/kg but could also be a red triangle (as is shown) because the ERM-Q of 1.5 > 1.17. The text on Page 20 (first paragraph under Current Sediment Concentration Conditions) does not help as here the word "and" is used when utilizing the two PRGs of 1.17 ERM-Q and 1.0 mg/kg total PCBs. For example Z4-44 is red yet does not exceed both PRGs,

Response: On Figure 4-6, the text defining the green triangle will be changed to: "Sample location with total ERM-Q less than 1.17 and total PCB concentration less than 1 mg/kg." The text in Section 4, p. 20, referring to the shaded concentrations, will be modified as follows: "The values are shaded green if the Total ERM-Q and Total PCB concentration are less than their respective PRGs (1.17 for the Total ERM-Q and 1 mg/kg for Total PCBs) and are shaded red if either the Total ERM-Q or Total PCB concentration is greater than its respective PRG."

Per further clarification provided by NOAA on October 20, 2011, the comment was to refer to Z4-42 versus Z4-44. The red shading for Z4-42 is correct because the ERM-Q of 1.5 for the sample exceeds the PRG of 1.17. Therefore, because one of the two PRGs was exceeded, the triangle is correctly shaded red.

Comment 2:

On Figure 4-6 it sure appears that Stations Z4-2 and Z4-36 are pointing to the same place. Both samples show an ERM-Q > 1.17 (although one of them shows a PCB concentration < 1.0 mg/kg) yet the triangle is green.

Response: The lines leading from the tags to sample locations Z4-2 and Z4-36 appear to point to the same location because the sample locations are overlapping. The figure will be modified to show triangles for both Z4-2 and Z4-36. The triangles for both Z4-2 and Z4-36 will be red.

Comment 3:

Proposed Sampling Locations - Figure 5-1 likely could use a few more station locations. That because the earlier surface samples are so close to the ERM-Q of 1.17 resulting in some doubt that we have correctly assessed the current sediment concentrations. For example SD-007 is barely above the PRG at 1.2 EM-Q and therefore a candidate for removal while Z4-C1 is not, yet it is close to the PRG at the 4-5' depth (0.92 vs 1.17) and also shows no surface measures.

Response: Please see the Navy's responses to EPA's September 26, 2011 comments for additional proposed sample locations. It is anticipated that the proposed additional samples

adequately address NOAA's concerns. The Navy is willing to discuss any additional NOAA concerns because the intention is for this PDI to be the last characterization study completed prior to remedial design. To clarify, the New London Team has agreed to the ERM-Q and PCB goals for sediment and the remedial goals were used to define the boundaries of potential remedial action in the FS and Proposed Plan, and they will be used to evaluate the new data collected under the PDI.

DECEMBER 30, 2012 COMMENTS:

Comment 1:

Pre-Design Investigation: No comments concerning the placement and number of samples but one question. When evaluating the PRGs of 1.17 for all chemicals and 1.0 mg/kg for PCBs, are the PCB concentrations included into the total ERM-Q (i.e., PCBs are one of the COCs). It appears so when examining Table 4-1 but this would mean using PCBs twice. Once for the total ERM-Q, the other against the PRG of 1.0 mg/kg total PCBs. Looking back it seems odd in doing this but for all I remember, I may have suggested it. Please explain.

January 3, 2012 Email Response:

Regarding the PDI SAP PRGs, PCBs are considered in both the ERM-Q calculation and as a stand-alone PRG. The New London Team decided these were appropriate PRGs based on the Battelle Baseline Ecological Risk Assessment included in the Thames River Validation Study. The decision was made approximately 2 years ago. These goals were used for the Inner/Outer Pier 1 Removal Action and they will be the goals for the sediment alternatives in the OU4 ROD.

Additional Response:

The following response supplements the January 3, 2012 response. PCBs are included in the ERM-Q RG to address ecological risks. PCB congener concentrations are used in the ERM-Q calculation and show compliance with the risk-based RG. The 1.0 mg/kg total PCB RG was selected to meet TSCA requirements. PCB Aroclor concentrations are used to show compliance with the TSCA-based RG.